

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Robert Dedmon,	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION NO. 4:21-cv-03371
	§	
vs.	§	Jury Demand
	§	
Shell Exploration & Production	§	
Company and Shell Trading	§	
Services Company,	§	
	§	
<i>Defendants.</i>	§	

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**JOINT REPORT ON STATUS OF SETTLEMENT &  
AGREED MOTION TO BRIEFLY (1) EXTEND PRETRIAL MATERIALS DEADLINE AND  
(2) DEFER RULING ON THE PENDING SUMMARY JUDGMENT MOTION,  
ALL DUE TO CONTINUING SETTLEMENT NEGOTIATIONS**

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**Status report on mediation and ongoing settlement negotiations.** The parties mediated this case on December 31, 2024 but have thereafter continued settlement negotiations through the mediator. The parties' efforts were slightly delayed because Shell has multiple decisionmakers and one of them was unavailable in a previously scheduled out-of-state trial during a portion of the post-mediation negotiations. However, the parties' settlement negotiations are ongoing and progressing.

**Nature of the case and January 31 pretrial materials deadline.** This is an unlawful employment practices case. It involves a current, and now former, employee's claims for race and color discrimination. It alleges a national unlawful pay practice dating back to at least 2014 and ongoing systemic discrimination concerning compensation and job grades. The Shell Defendants dispute the allegations and assert a number of defenses.

January 31, 2025 is the current deadline to file motions in limine and a joint pretrial order that must also contain the pretrial disclosures required by Fed. R. Civ. P. 26(a)(3). Docket call is currently scheduled for February 18, 2025.

**Requested relief and follow-up report on settlement.** First, the parties respectfully request an extension through and including [February 10, 2025](#) to file the joint pretrial order and any motions in limine. Second, the parties respectfully request that the Court [continue to defer any ruling](#) on the pending summary judgment motion so as not to derail continued settlement negotiations. Third, the parties will promptly advise the Court if the case settles and will advise the Court on or before [February 10, 2025](#) if the parties have hit an impasse on settlement.

Respectfully submitted,

*/s/ Amy Gibson*

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*/s/ Marlene Williams by AGibson at the  
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### **CERTIFICATE OF COMPLIANCE**

The following is based on the word-count tool in the most current version of Microsoft® Word for Mac. The undersigned certifies that the foregoing *joint motion* contains 610 words, *including* the case caption, any table of contents, any table of authorities, the signature block, and all certificates.

*/s/ Amy Gibson*

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Amy E. Gibson

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on January 30, 2025, she filed the foregoing *joint motion* with the United States District Court for the Southern District of Texas through the CM/ECF system, such that the Shell Defendants should be served with a copy of the filed document as follows:

**VIA CM/ECF SYSTEM**

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